

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

MICHELLE J. KINNUCAN,

Plaintiff,

v.

NATIONAL SECURITY AGENCY, CENTRAL
INTELLIGENCE AGENCY, AND
DEPARTMENT OF DEFENSE,

Defendants.

Case No. 2:20-cv-1309 MJP

**PARTIES' STIPULATED MOTION AND
ORDER TO EXTEND FILING
DEADLINE FOR PLAINTIFF'S MOTION
FOR FEES AND COSTS**

NOTE ON MOTION CALENDAR:
August 10, 2023

STIPULATED MOTION

Pursuant to Local Civil Rule 7(j) and 10(g), Plaintiff Michelle Kinnucan (“Plaintiff”) and Defendants National Security Agency, Department of Defense, and Central Intelligence Agency (collectively, “Defendants”) move the Court for an order extending the time by which Plaintiff must file her motion for attorneys’ fees and costs. Specifically, the Parties request a 60-day extension of the F.R.C.P. 54(d)(2)(B)(i) deadline as follows:

Deadline	Current Date	Revised Date
Motion for Fees and Costs	August 14, 2023	October 13, 2023

There is good cause to extend this deadline because the parties are currently negotiating a potential resolution and settlement, which if successful, would obviate the need for expenditure of further litigant and judicial resources. Good cause also exists because there is no prejudice towards any party. Accordingly, the Parties respectfully request the Court grant this Motion.

IT IS SO STIPULATED, THROUGH PARTIES OF RECORD

I certify that this paper contains 143 words, in compliance with Local Civil Rule 7(e)(1).

DATED this 10th day of August, 2023.

TESSA M. GORMAN
Acting United States Attorney

DAVIS WRIGHT TREMAINE LLP

By s/ Katie D. Fairchild
KATIE D. FAIRCHILD, WSBA #47712
Assistant United States Attorney
United States Attorney’s Office
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
Telephone: 206-553-4358
E-mail: katie.fairchild@usdoj.gov

By s/ Caesar Kalinowski IV
Caesar Kalinowski IV, WSBA #52650
920 5th Avenue, Suite 3300
Seattle, WA 98104-1610
Telephone: (206) 622-3150
E-mail: caesarkalinowski@dwt.com

Attorney for Federal Defendants

Thomas R. Burke (*pro hac vice*)
505 Montgomery Street, Suite 800
San Francisco, CA 94111-6533
Telephone: (415) 276-6500
E-mail: thomasburke@dwt.com

Attorneys for Plaintiff Michelle J. Kinnucan

ORDER

Having reviewed the Parties' Stipulated Motion, the Court finds good cause and GRANTS the Motion. The deadline by which Plaintiff must move for attorneys' fees and costs is October 13, 2023.

Dated this 11th day of August, 2023.



MARSHA J. PECHMAN
United States Senior District Judge